

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
	:	
Stacey L. Calhoun	:	No. 19-14655-JKF
Debtor	:	

ANSWER TO MOTION OF M&T BANK
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted payments were missed and debtor asks for the chance to catch up.
7. Debtor wishes to avoid the same.
8. Debtor is unsure of the total owed and asks for the chance to catch up.
9. Denied as relevant.
10. Denied. Debtor asks for the chance to catch up.
11. No response required.

WHEREFORE Debtors respectfully request this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)

Dated: 2/3/20

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CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of M&T Bank
bkgroup@kmlawgroup.com

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 2/3/20